

## COMMENT SET 6: VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT



Ventura County  
Air Pollution  
Control District

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Air Pollution Control Officer

September 6, 2006

Peter Strait, Project Manager  
California State Lands Commission  
100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825

Subject: Request for Review of Draft Environmental Impact Report for the Venoco  
Ellwood Marine Terminal Lease Renewal Project

Dear Mr. Strait:

Ventura County Air Pollution Control District staff has reviewed the subject draft environmental impact report (DEIR), which involves a proposal to allow Venoco to continue operating the offshore improvements associated with the Ellwood Marine Terminal. The Ellwood Marine Terminal (EMT) is a crude oil marine loading terminal and associated storage facility, through February 2013, or for the next seven years. A new State lease would allow Venoco to continue operating the offshore improvements associated with the EMT, the associated onshore storage facility, and barge transit operations along coastal shipping routes to the Los Angeles and San Francisco Bay areas. The proposed project does not involve construction of any new facilities or modifications to any existing facility, however, it includes the potential for increasing crude oil throughput and transportation from current levels to the permitted levels. The project location is adjacent to the Pacific Ocean west of Coal Oil Point in Santa Barbara County.

Chapter 4.9 of the DEIR addresses transportation and circulation related to the project. Section 4.9.1, Environmental Setting (Page 4.9-3, Line 17), states that marine vessels associated with the EMT traverse an area between the EMT and the Santa Barbara Channel shipping lanes, and then onward to the port delivery terminal (Port of Los Angeles/Long Beach or San Francisco Bay destination). This discussion states that vessels associated with the EMT are currently limited to the use of the barge "Jovalan" and associated support vessels. The project description indicates that the offshore improvements will be used to transfer crude oil to the barge for transportation of crude oil from Santa Barbara to market, and that this transportation method eliminates the need for tanker truck transportation of crude oil from Santa Barbara to those markets. We recommend that the marine traffic discussion be expanded to estimate any potential air quality impacts in Ventura County waters, including the Port of Hueneme, associated with an increase in marine traffic from the project.

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Thank you for the opportunity to comment on this project. If you have any questions, please call me at (805) 645-1426.

**RESPONSE TO COMMENT SET 6: VENTURA COUNTY AIR POLLUTION  
CONTROL DISTRICT**

1 VCA-1            The potentially increased annual trips of the barge through the offshore  
2 area under the VCAPCD jurisdiction would result in increased annual  
3 air emissions. The proposed project will not, however, result in  
4 increases of daily emissions: the frequency of barge trips is being  
5 increased, but the impact of each trip individually remains the same.  
6 For this reason the Air Quality impact discussion has been amended to  
7 examine yearly emissions, thus capturing the potential air quality  
8 impacts associated with the increase in vessel traffic. Please see pages  
9 4-26 to 4-37 of this Addendum.